

**Administrative Determination (AD)**  
**Documentation of Land Use Plan Conformance and NEPA Adequacy (DNA)**  
U.S. Department of the Interior - Bureau of Land Management  
Anchorage Field Office

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**A. Describe the Proposed Action**

Marathon Oil Company has proposed to plug back and drill a sidetrack to an existing gas well on Federal Lease A-028142 in the Kenai Gas Field. In an earlier attempt to perform well re-completion on the KU 24-5 well, Marathon stuck a tool in the well. They propose to plug back the 24-5 well and drill a sidetrack rather than face an expensive fishing job. The sidetracked well will be called KU 24-5RD, and will be drilled to nearly the same depth and bottom hole location as the 24-5 well. The well will be cased and the casing will be cemented from the total depth of the well to 3,500 feet to isolate the upper portion of the well from the completed formation. The well is located in the NE $\frac{1}{4}$ NE $\frac{1}{4}$  of Section 7, T. 4 N., R. 11 W., S.M., about 7.5 miles south of Kenai, Alaska. The well will have a bottom hole location in the SW $\frac{1}{4}$ SW $\frac{1}{4}$  of Section 5, T. 4 N., R. 11 W., S.M. No new surface disturbance is planned. The well is located on an existing Marathon well pad, the 41-7. The sidetrack will be directionally drilled to a vertical depth of 4,050 feet with a measured depth of 4,608 feet and completed in the Sterling formation. Surface estate is owned by the Salamatof Native Association, Inc. and managed by the Cook Inlet Region, Inc. (CIRI). Mineral estate is owned by CIRI and managed by the BLM.

The sidetrack operation is proposed to begin in mid August 2001 and should take 2-3 weeks to complete. Water used in the drilling process will come from an existing water well on location. All drilling fluids will be contained within a closed steel tank system. The tanks contain equipment to remove the drilled cuttings. The cuttings and excess drilling fluid will be trucked to a Kenai Field Class II disposal well (KU 24-7). Completion fluids will be trucked to Well WD #1, an approved disposal well.

Gas from the well will be produced and processed through existing facilities on the 41-7 pad.

**B. Land Use Plan (LUP) Conformance**

BLM has not developed a land use plan for oil and gas development in the Kenai Peninsula area. The original well was approved under a categorical exclusion (CX) when it was drilled in 1982. BLM no longer considers a CX appropriate for authorizing new drilling. The subject Proposed Action, however, is very similar to the Proposed Action described in EA No. AK-040-99-022 (Kenai Gas Field Development Wells 33-6 and 42-7, August 1999). The impacts will be less than those addressed EA-040-99-022 since the well already exists and the duration of the work will be two weeks shorter. The EA, therefore, provides a basis for a decision on the proposal in accordance with federal regulations (Title 43 CFR Part 1610.8(b)(1)).

**C. Identify applicable NEPA documents and other related documents that cover the Proposed Action.**

EA No. AK-040-99-022; Kenai Gas Field Development Wells 33-6 and 42-7, August 1999.

**D. NEPA Adequacy Criteria**

- 1. Is the current Proposed Action substantially the same action (or is a part of that action) as previously analyzed? Is the current Proposed Action located at a site specifically analyzed in an existing document?**

The Proposed Action is nearly identical to that described in the Kenai Gas Field Development EA (KGF EA). The Proposed Action is located on the same pad (41-7) as the pad described in the KGF EA. (see attached map).

- 2. Is the range of alternatives analyzed in the existing NEPA document(s) appropriate with respect to the current Proposed Action, given current environmental concerns, interests, and resource values?**

The alternatives analyzed in the KGF EA were; allow the drilling and deny the drilling. The environmental issues and concerns have not changed since the signing of the EA.

- 3. Is the existing analysis valid in light of any new information or circumstances?**

There is no new information or circumstances that would affect the validity of the existing analysis.

- 4. Do the methodology and analytical approach used in the existing NEPA document(s) continue to be appropriate for the current Proposed Action?**

Yes.

5. **Are the direct and indirect impacts of the current Proposed Action substantially unchanged from those identified in the existing NEPA document(s)? Does the existing NEPA document analyze site-specific impacts related to the current Proposed Action?**  
The direct and indirect impacts identified in the KGF EA are the slightly greater as would be anticipated for the Proposed Action. The setting, affected resources, and location are so similar that the KGF EA provides a reasonable basis for making a decision on the Proposed Action.
6. **Are the cumulative impacts that would result from implementation of the current Proposed Action substantially unchanged from those analyzed in the existing NEPA document(s)?**  
Yes, they are identical.
7. **Are the public involvement and interagency review associated with existing NEPA document(s) adequate for the current Proposed Action?**  
The proposal for which the KGF EA was written was posted for 30 days and received no comments. The current proposal will also be posted for 30 days.

**E. Interdisciplinary Analysis:**

See attached NEPA routing sheet and specialists' worksheets in case file A-028142.

**F. Conclusion**

Based on the review documented above, I conclude that this proposal conforms to the applicable land use plan or is in accordance with federal regulations (Title 43 Code of Federal Regulations, Part 1610.8 (b)(1)) and that the NEPA documentation fully covers the proposed action and constitutes BLM's compliance with the requirements of NEPA

/s/ Clinton E. Hanson, Acting  
Anchorage Field Manager

12-20-01  
Date